

June 24, 2021

By CM/ECF Posting

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street, Room 2230
New York, New York 10007-1312

Re: Shatsky v. The Palestine Liberation Org., Case No. 18 Civ. 12355 (MKV)

Dear Judge Vyskocil:

Undersigned counsel for the parties have been working cooperatively to complete the jurisdictional discovery authorized by the Court's February 8, 2021 Order (Dkt. #60), consistent with the Court's supplemental Order of April 29, 2021, which requires completion of such discovery not later than July 9, 2021, without extension (Dkt. #80). Jurisdictional discovery, including depositions, will be materially complete by July 9. However, there are scheduling difficulties affecting three of the deponents defendants will be producing, which the parties can resolve if, as the parties jointly request, the Court grants them leave to complete those remaining depositions by July 30, 2021.

Further, if the Court grants such leave, then the parties respectfully request an adjustment of the briefing schedule for dispositive motions set by the Court's April 29, 2021 Order, so that the parties' briefs can reflect the results of jurisdictional discovery. Subject to approval of the Court, the parties jointly request that the Court approve an amended briefing schedule, as follows: Defendants shall file their contemplated dispositive motions by August 20, 2021; Plaintiffs shall respond by September 20, 2021; and Defendants shall reply by October 6, 2021.

Finally, to facilitate the expeditious completion of all jurisdictional discovery depositions, the parties respectfully request that Your Honor make a limited referral to a magistrate judge, to be available during those depositions to rule on potential objections concerning the scope of questioning allowed with respect to the jurisdictional issues, and/or potential assertions of United Nations functional immunity, both of which were addressed in the Court's April 29, 2021 Order and by the Court's instructions during the April 29, 2021, telephonic hearing. *See* Dkt. #80.

We thank the Court for its consideration of these requests.

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Respectfully submitted,

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cc: All Counsel (by CM/ECF Posting)